

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATT TIBBELS,

Defendant.

FILED
US DISTRICT COURT
DISTRICT OF NEBRASKA

JAN 19 2022

OFFICE OF THE CLERK

4:21CR3133

SUPERSEDING INDICTMENT

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2251(a)

The Grand Jury charges that

COUNT I

Beginning at least on or about August 31, 2020 until on or about October 4, 2021 in the District of Nebraska, the defendant, MATT TIBBELS, knowingly received any child pornography as defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate commerce and that has been shipped or transported in or affecting interstate or foreign commerce, by any means, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT II

On or about October 5, 2021, in the District of Nebraska, MATT TIBBELS, the defendant, did knowingly possess one or more computer files and other matter which contained an image of child pornography, the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, said computer files and other matter had been shipped or transported in interstate commerce by

4:21cr 3133

any means, including by computer including images of child pornography, involving prepubescent minors or minors who had not attained 12 years of age.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT III

On or about July 7, 2020, within the District of Nebraska, MATT TIBBELS, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

A TRUE BILL. / - A

FOREPERSON _____

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.


TESSIE L. SMITH
Assistant United States Attorney